

EXHIBIT C

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

CATHX RESEARCH LTD.,

Plaintiff,

v.

2G ROBOTICS INC. a/k/a VOYIS
IMAGING, INC.,

Defendant.

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Case No. 5:21-cv-00077-RWS

**DEFENDANT VOYIS IMAGING, INC.’S
REVISED ELECTION OF ASSERTED PRIOR ART**

Pursuant to the Fourth Amended Docket Control Order (Dkt. 129) and the Court’s Order (Dkt. 134) regarding E.D. Tex. GO 13-20 (“General Order Adopting Model Order Focusing Patent Claims and Prior Art to Reduce Cost”), Voyis Imaging, Inc. (“Voyis”) hereby identifies the following prior art combinations with respect to the asserted claims of the patents-in-suit. Voyis also incorporates by reference its initial, supplemental, second, third supplemental invalidity contentions, and the expert report of Dr. Matthew Johnson-Roberson. Voyis reserves the right to modify this election based on the outcome of the currently pending motion regarding Cathx’s request for reconsideration of the Court’s claim construction rulings. *See* Dkt. Nos. 105, 106. The specific elected combinations of prior art references as to each of the patents-in-suit is set forth below.

U.S. Patent No. 10,116,841 Elected Prior Art Combinations

1. *Maki-1*¹ in view of *Madden*² and *Hudritsch*³
2. *Maki-1* in view of *Madden*, *Hudritsch* and *MacDonald*⁴
3. *Maki-2*⁵ in view of *Madden* and *Hudritsch*
4. *Maki-2* in view of *Madden*, *Hudritsch* and *MacDonald*
5. *LPP Offer For Sale*⁶ in view of *Madden* and *Hudritsch*
6. *LPP Offer For Sale* in view of *Madden*, *Hudritsch* and *MacDonald*

U.S. Patent No. 10,116,842 Elected Prior Art Combinations

1. *Maki-1* in view of *Madden* and *Hudritsch*
2. *Maki-1* in view of *Madden*, *Hudritsch* and *MacDonald*
3. *Maki-2* in view of *Madden* and *Hudritsch*
4. *Maki-2* in view of *Madden*, *Hudritsch* and *MacDonald*
5. *LPP Offer For Sale* in view of *Madden*, *Hudritsch* and *MacDonald*
6. *LPP Offer For Sale* in view of *Madden*, *Hudritsch* and *Gillham*⁷

¹ Development of the AUV Tri-TON for Imaging Rough Seafloor (“Maki-1”)

² US 2011/0228075 (“Madden”)

³ US 2012/0069172 (“Hudritsch”)

⁴ Deep-Ocean Use of the SM2000 Laser Line Scanner on Submarine NR-1 Demonstrates System Potential for Industry and Basic Science (“MacDonald”)

⁵ Volumetric Mapping of Tubeworm Colonies in Kagoshima Bay through Autonomous Robotic Surveys (“Maki-2”)

⁶ ULS-500 integration with the Hugin AUV (“LPP Offer For Sale”)

⁷ US 2012/0062963 (“Gillham”)

Dated: January 25, 2023

Respectfully submitted,

By: **BENESCH, FRIEDLANDER, COPLAN
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/s/ Mircea Tipescu

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CERTIFICATE OF SERVICE

I, Cristina Almendarez, an attorney of record in this matter, hereby certify that on January 25, 2023, I emailed the following to all counsel of record:

DEFENDANT'S REVISED ELECTION OF ASSERTED PRIOR ART

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